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20 **UNITED STATES DISTRICT COURT**

21 **CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION**

22 YUNG KIM, on behalf of himself and  
23 all others similarly situated,

24 Plaintiff,

25 vs.

26 GENERAL MOTORS LLC and DOES  
1 through 10, inclusive,

27 Defendants.  
28

Case No. CV 11-06459 GAF (MRWx)

**STIPULATION FOR DISMISSAL  
WITH PREJUDICE**

**[Rule 41(a)(1)(A)(ii), F.R.Civ.P.]**

1       Whereas, this action was brought as a putative class action, and plaintiff  
2 Yung Kim (“Plaintiff”) and defendant General Motors LLC (“GM”) are the only  
3 parties to have appeared in this case.

4       Whereas, following discovery and partial briefing on individual and class  
5 issues, Plaintiff and GM have reached an individual settlement, and Plaintiff seeks  
6 to dismiss the entire complaint.

7       Whereas, the terms of the settlement are confidential between the parties, but  
8 both parties represent that the consideration for the settlement was limited to the  
9 individual case. There was no consideration for the settlement that involved  
10 compensation to the Plaintiff, or payment of attorney fees and costs to Plaintiff’s  
11 counsel, relating to class allegations.

12       Whereas, no aspect of this settlement precludes in any way other customers  
13 from bringing their own individual or class action lawsuit arising from the same  
14 allegations as were advanced by Plaintiff.

15       **IT IS HEREBY STIPULATED**, by and between Plaintiff and GM, by and  
16 through their respective counsel of record, pursuant to and in accordance with the  
17 terms of Rule 41(a)(1)(A)(ii), that Plaintiff’s First Amended Complaint and the  
18 action are hereby dismissed with prejudice.

19 DATED:    May 15, 2013

RICHARD D. MCCUNE  
JAE (EDDIE) K. KIM  
McCUNE WRIGHT LLP

21  
22 By:   /s/ Richard D. McCune

23 DANIEL H. CHANG  
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26 By:   /s/ Daniel H. Chang  
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EDWARD W. CHOI  
LAW OFFICES OF CHOI &  
ASSOCIATES, A Professional Corporation

By: /s/ Edward W. Choi

Attorneys for Plaintiff  
Yung Kim

DATED: May 15, 2013

GREGORY R. OXFORD  
ISAACS CLOUSE CROSE & OXFORD LLP

By: /s/ Gregory R. Oxford

Attorneys for Defendant  
General Motors LLC